

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

RECORD REQUEST: Verizon Massachusetts to AT&T Communications of New England, Inc.

DATE: February 4, 2002

RR-VZ-5 Please provide a copy of the documentation supporting the \$205.00 figure listed in the "Pole Investment Labor" column on page 2 of the attachment to AT&T's response to VZ-ATT 1-97.

Respondent: John C. Donovan

RESPONSE: Though the \$205.00 figure is based on information provided by a vendor, the specific document supporting this value is not within the Fasset document pile produced in response to VZ-ATT 1-80 and AT&T does not possess it.

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D.T.E. NO. 01-20

RECORD                      Department of Telecommunications and Energy to AT&T  
REQUEST:                  Communications of New England, Inc.

DATE:                      February 5, 2002

RR-DTE-75                  a) How much dark fiber has AT&T purchased from Verizon MA since  
   the date of the Department's order making it available for purchase as  
   a UNE?

   b) Does AT&T have a dark fiber demand forecast in Massachusetts? If  
   so, please provide to the Department.

   c) Has AT&T ever not been able to purchase dark fiber from Verizon  
   MA? If so, what was the magnitude of the proposed purchase?

RESPONSE:                  a) AT&T has not purchased dark fiber from Verizon MA since the date  
   of the Department's order making it available for purchase as a UNE.

   b) AT&T does not have a dark fiber demand forecast in Massachusetts.  
   Due to a lack of fiber in Boston, however, AT&T expects that  
   purchases of dark fiber in that area may soon become necessary.

   c) AT&T has not yet attempted a purchase of dark fiber from Verizon  
   MA.

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RECORD REQUEST: Department of Telecommunications and Energy to AT&T  
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DATE: February 5, 2002

RR-DTE-76 Referring to the table of MDU locations at Page 37 of Mr. Donovan's rebuttal testimony, please indicate whether each location listed is a residential or commercial building. Furthermore, please state what criteria, if any, were used in selecting the sample of MDU locations listed.

RESPONSE: All of the MDU locations listed are residential buildings. The survey was conducted by Outside Plant Area Supervisors for AT&T Broadband in Massachusetts, New Hampshire and Maine. The supervisors were encouraged to select a cross section of buildings to create a range of types and sizes of MDUs. In several instances, recently completed installation projects were selected as the measuring of cable distances in such units was made easier because unit walls were still open. Please refer to AT&T and WorldCom's response to VZ-ATT/WC 1-34 for further information concerning how the survey was conducted.

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DATE: February 5, 2002

RR-DTE-79 Give rough approximations of the AT&T cost drivers listed below within the four density zones proposed by Verizon and listed within DTE Exhibit No. 7. Break down each into aerial, underground and buried plant:

- a) structure mix for both distribution and feeder
- b) pole spacing
- c) manhole spacing
- d) structure-sharing for both distribution and feeder

Respondent: Robert A. Mercer

RESPONSE: Please see the attached response.

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D.T.E. NO. 01-20

RECORD  
REQUEST: Department of Telecommunications and Energy to AT&T  
Communications of New England, Inc.

DATE: February 5, 2002

RR-DTE-80 Give the average loop length (combined feeder and distribution) as  
modeled by the HAI 5.2a-MA Model within each of the four density  
zones proposed by Verizon and listed within DTE Exhibit No. 7.

Respondent: Robert A. Mercer

RESPONSE: Please see the attached response.